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Steven J. Abelson, Esq.

December 10, 2021

Honorable Kathryn C. Ferguson
402 E. State Street
Trenton, NJ 08650

Re: In re Marzella
Case # 20-24073
Motion to Sell: Returnable 12/21/21

Dear Judge Ferguson:

I am in receipt of the "Limited Objection" to the Motion filed by counsel for PNC Bank.

We would not agree to the proposed language as there is no legal basis to compel the Debtor to "waive any challenge to the contractual calculation of the full amount due." While counsel's suggested language purportedly "reserves the right to question, contest and/ or request verification of any line item," the requested waiver above seems to significantly undercut that protection.

I should state that counsel seems to be creating an issue where one does not exist. I have not been advised by special counsel of any issue with the payoff and the standard form of Order submitted to the Court with the motion explicitly states "The proceeds of sale must be used to satisfy the liens on the real property unless the liens are otherwise avoided by court order," – which is not the case.

Accordingly, we would respectfully ask the Court to overrule the Limited Objection. Thank you.

Very truly yours,
/s/ Steven J. Abelson
ABELSON LAW OFFICES
By: Steven J. Abelson

SJA/aoc
Christian Del Toro, Esq.
Nicole Nigrelli, Sub V Trustee
United States Trustee



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